

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MARK I. SOKOLOW, et al.,
Plaintiffs,

- vs -

Case No.
04-CV-397 (GBD) (RLE)

PALESTINE LIBERATION
ORGANIZATION, et al.,

Defendants.

DEPOSITION OF DR. LORI ALLEN

Tuesday, November 19, 2013

9:15 a.m.

Reported by:

Fiona Farson

Ref. No.: 10763

1 MR. HILL: Objection, lack of foundation.

2 A. Again, I don't know what official relationship it may
3 have had. I had a sense of how Palestinians regarded
4 that newspaper as being reflective of the PA.

5 BY MR. YALOWITZ:

6 Q. Reflective of the official views of the PA?

7 A. As I said, I understood Palestinians understood this
8 newspaper to be affiliated or reflective of --
9 I understood that Palestinians believed that newspaper
10 to be associated with the PA.

11 Q. Al-Hayat al-Jadida was distributed primarily at the
12 ministries and government organizations; is that true?

13 A. I don't know.

14 Q. Why don't we look at page 75 of the media map in front
15 of you; let's see if we can find out what they say about
16 it.

17 Do you see the entry on Al-Hayat al-Jadida in the
18 Palestinian Media Map?

19 A. Yes.

20 Q. They say that Al-Hayat al-Jadida is partially funded by
21 the government; do you see that?

22 A. Yes.

23 Q. Do you know whether that's true or false?

24 A. I do not know.

25 Q. Do you see they are reporting Al-Hayat al-Jadida is

1 right?

2 A. Yes.

3 Q. And do you see in the second paragraph, you say:

4 "In this climate of ideologically hidebound
5 discourse, it is a relief to discover Robert Pape's
6 rational and careful analysis in Dying to Win..."?

7 A. Yes.

8 Q. That's -- that was your review; right?

9 A. Yes.

10 Q. And do you stand by that review, or not?

11 A. I stand by my review and what I said in my earlier
12 comment, explaining further what I said in this review,
13 which is that it's a rational analysis, and I had
14 objections to some aspects of the book.

15 Q. You thought that, for example, his understanding of
16 martyrdom was confined by the disciplinary strictures of
17 political science?

18 A. For example.

19 Q. And -- and so you identified the limitations you saw in
20 the review; right?

21 A. I attempted to do that, yes.

22 Q. And then on page 112, you wrote:

23 "Despite these limitations, Dying to Win is
24 a generally well-reasoned book that hopefully will
25 inject some much-needed equanimity and rationality into

1 popular debates and U.S. foreign policy in the Middle
2 East and beyond"; right?

3 A. Yes.

4 Q. And do you stand by that view, that it is a generally
5 well-reasoned book?

6 A. I thought so, yes.

7 Q. Okay; great. And indeed, you cited his book in your
8 report in our case; right?

9 A. Yes.

10 Q. And you agree with his conclusion in his book that:

11 "Suicide terrorism is not irrational, random, or
12 pathological, but rather political, organized and
13 directed towards specific, secular goals"; right?

14 A. Is that a quote from my report? Or a quote from --

15 Q. It is not a quote from your report; it is a quote from
16 your book review. I think it's also in your
17 dissertation, if memory serves.

18 A. Can you tell me what page in the review?

19 Q. Sure. Page 111.

20 A. Can you repeat the quote, please?

21 Q. Sure. We're in the first column, first full paragraph,
22 halfway through:

23 "Suicide terrorism is not irrational, random, or
24 pathological, but rather political, organized, and
25 directed toward specific, secular goals."

1 Are you with me?

2 A. One moment, please.

3 Q. Sure.

4 A. So -- I've found the sentence that you quoted.

5 Q. And do you -- sitting here today, do you agree that that
6 is correct?

7 A. What I agree is that this was Pape's assessment, that
8 suicide terrorism is not irrational, random, or
9 pathological.

10 Q. Right, but it's your assessment as well, isn't it?

11 A. No. Here I'm summarizing Pape's assessment.

12 Q. Well, I'm asking you: Do you agree with it?

13 A. It's too broad of a statement to be able to simply
14 agree. Suicide terrorism is different in different
15 contexts, which is something that this book points out.
16 And in fact, in this section, he is referring to
17 Sri Lanka, or -- I point out that he's using Sri Lanka
18 as an example of a secular -- a secular organization
19 using suicide bombings.

20 Q. So -- so this is not your view; this is Pape's view?

21 A. In this review, in this section, I am summarizing Pape's
22 analysis, pointing out that he is trying to present
23 a more nuanced understanding of where suicide terrorism
24 is carried out, and why. And one of his arguments that
25 I'm recounting here is that suicide terrorism is not

1 primarily or in the majority a -- religiously driven,
2 and certainly not a primarily or majority Muslim kind of
3 activity.

4 Q. Do you -- is it your opinion that -- that suicide
5 terrorism is political, organized, and directed toward
6 specific secular goals?

7 A. It depends on the case.

8 Q. How about the case of the Al-Aqsa Intifada, for one?

9 A. So you're asking me if the suicide terror acts that were
10 undertaken throughout the Second Intifada were secular
11 and political?

12 Q. Political, organized, and directed towards specific
13 secular goals.

14 A. And I can't make a general claim about suicide terrorism
15 or suicide acts, generally, during that
16 three-to-five-year period, however you count it.

17 Q. So -- so I guess I need to mark your dissertation.

18 A. Fine.

19 MR. YALOWITZ: So we'll mark it as Allen 14.

20 (Exhibit 14 marked for identification.)

21 BY MR. YALOWITZ:

22 Q. Do you have it before you?

23 Do you want to glance at it, or will you accept my
24 representation that it is indeed the dissertation of
25 Dr. Lori A. Allen?

1 A. I will accept that representation.

2 Q. Outstanding.

3 Why don't you look with me on page 367.

4 Not only did I buy it, but I read it.

5 A. I will not comment.

6 Sorry, I'm going to have to undo this.

7 Q. Sure, you can take the binder clip off.

8 Are you there?

9 A. Yes.

10 Q. Do you see you're talking about Robert Pape?

11 A. Yes.

12 Q. You say he's among the most levelheaded approaches;
13 right?

14 A. Yes.

15 Q. And this is your dissertation; this is your opinion.
16 Right?

17 A. Correct.

18 Q. And then you say what his argument is; right?

19 A. Yes.

20 Q. You say that his argument is "... a response by weaker
21 actors against foreign occupation by democratic states,
22 and that it 'makes strategic sense,' usually as a last
23 resort when crucial national interests are at stake";
24 right?

25 A. That is a paraphrase and partial quote of his book.

1 resistance to the occupation were political rather
2 than -- rather than things that could be dismissed as
3 the pathological -- pathological and irrational acts of
4 people who couldn't be understood.

5 So that's the point I'm making in this section of
6 the dissertation.

7 Q. Do you recall Pape's -- thank you, by the way; that's
8 helpful.

9 Do you recall Pape's central thesis about what
10 causes suicide terrorism?

11 A. If I recall correctly, he's trying to make the point
12 that people resort to suicide terrorism not out of
13 religious motivations, but because it is in many cases
14 a rational effort to achieve political liberation or
15 independence, or whatever the Sri Lankan Tigers or the
16 other organizations he analyzes were after.

17 Q. So let me give you an excerpt from his book, and I'll
18 ask you some questions about it; okay?

19 A. Okay.

20 MR. YALOWITZ: Do we have the excerpt? I think it's at the
21 very end of our ...

22 Looks like it's 53.

23 (Discussion off the record.)

24 MR. YALOWITZ: We'll mark an excerpt from Dr. Pape's book as
25 exhibit 15.

1 MR. HILL: Objection, vague.

2 A. I believe that what makes his analysis rational and
3 careful is his attempt to contextualize suicide
4 terrorism on these different dimensions.

5 BY MR. YALOWITZ:

6 Q. And do you disagree with his assessment of the strategic
7 logic?

8 MR. HILL: Objection, vague. Lack of foundation.

9 A. Once again, his analysis is attempting to make broad
10 claims about a broad phenomenon, drawing on specific
11 cases. Here he mentions Hezbollah and Lebanon Hamas in
12 the West Bank and the Tigers in Sri Lanka. He's
13 conducting a broad kind of political science analysis,
14 and his focus is on answering the question of what is
15 the strategic logic of -- behind these phenomenon
16 generally.

17 Your question about whether or not I agree with --
18 whether or not I agree with his statement that -- if
19 I agree with his statement that such attacks happen as
20 part of a larger campaign by an organized group,
21 I agree that that's his analysis; but I have nothing to
22 say, really, about the organization of these kinds of
23 attacks in any specific terrorist campaign, so-called.

24 Q. Sure. So do you know -- by the way, before I get to
25 that -- I'm sorry, let me withdraw that question.

1 movement, then, yes, part of my research did allow me to
2 understand some aspects of how people would speak
3 publicly or explain themselves or activities.

4 BY MR. YALOWITZ:

5 Q. Would you agree with me that the strategic objective of
6 the leaders of the Second Intifada, such as Arafat
7 and Marwan Barghouti, was to end the occupation?

8 MR. HILL: Objection, lack of foundation.

9 A. I don't know that Barghouti and Arafat were leaders of
10 the Second Intifada. My understanding of the Second
11 Intifada was that it was a broad, confused, confusing
12 period for everybody living in the Occupied Territories
13 during that period.

14 So I can't answer your question, because I don't --
15 I don't agree with the premise that there were leaders
16 of it.

17 Q. Really? Let's learn together.

18 First of all, you would agree with me that the
19 primary goal of the Second Intifada was ending the
20 occupation; right?

21 A. I would agree with that.

22 Q. So I want to take you through a little -- let's do
23 a little case study; okay?

24 MR. HILL: Kent, before you do the case study, can we get
25 a restroom break?